

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of

Review of the Emergency Alert System

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EB Docket No. 04-296

COMMENTS OF GLOBAL MARKETING SOLUTIONS, INC.

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Global Marketing Solutions, Inc. - Comments Concerning the Review of the
Emergency Alert System (EAS)

Global Marketing Solutions, Inc. hereby files comments to the Commission's Notice of Proposed Rulemaking (NPRM) to examine the Emergency Alert System (EAS).

I. SUMMARY

Global Marketing Solutions, Inc. encourages the Commission to look to alternate forms of new technology and mediums to inform and alert the public as part of its overall public alert and warning system. These forms of new technology and mediums should enhance, not replace, the existing EAS as it is currently structured. In addition, the cost of implementation along with the cost of continued operation and maintenance should be a considering factor in determining whether or not such a technology and/or medium should be included as part of an improved and updated EAS. Finally, such a system should have within it the ability for local, state and Federal agencies to communicate continuously (24 hours per day) to the public important warnings, messages and information. These alternate technologies and/or mediums should also contain the ability to transmit local or regional information such as Amber alerts, weather alerts, traffic alerts, and alerts seeking the assistance of the public in apprehending criminal suspects sought by various local, state and Federal law enforcement agencies.

II. INTRODUCTION

1. The following comments are offered to the Commission by Global Marketing Solutions, Inc., an Idaho corporation involved in the advertising and marketing industry. Our experience in the field of effectively reaching large audiences using various mediums and techniques known in the art places us in a unique position to comment on specific areas of concern contained in the proposed update to the EAS.

Although incredibly outdated in light of current technology, the change in patterns of movement and mobility within our society, and the way in which we receive our information since its inception as CONELRAD in 1951, the current EAS, using television and radio as its primary means for communicating warnings, alerts and information to the public, has already proven itself a valuable public alert system.

In reviewing the Commission's Notice of Proposed Rulemaking (NPRM) to examine the Emergency Alert System (EAS), management at Global Marketing, Solutions, Inc. noticed room for expansion and improvement in many areas of the EAS. However, our focus in our comments to the Commission will be on the development and implementation of new technology and the steps necessary to making one such medium, which utilizes cutting edge technology to reach specific targeted audiences on a local, regional, or national level, an integral part of a greatly improved EAS. We will also be briefly discussing the opportunity for the inclusion of this technology in a nationwide integrated system paid for, not by tax dollars, but by private industry, and the governmental assistance and partnership required for its ultimate realization.

III. COMMENTS

1. **Sec. E 31.** In creating EAS, the Commission sought to design a public alert and warning system that would function seamlessly with many sources of emergency communications. The Commission wished to avoid limiting EAS to a particular transmission system, so it adopted a mandatory standard digital protocol with a flexible architecture that the Commission believed could be used by many kinds of transmission media, encompass new technologies, and be expanded and upgraded as new kinds and generations of transmission systems became available. Despite this intended technical flexibility, EAS, as currently constituted, reaches the very limited audience listening to broadcast radio or watching broadcast or cable television at the time the emergency announcement is made. The most ubiquitous outlet for EAS is radio. However, on average, Americans listen to the radio for only about an hour and a half a day, primarily between 6:00 a.m. and 6:00p.m. Even fewer people are reached by television. Although more than 98 percent of households in the United States have at least one television, the average set is in use only 31 percent of the day. We seek comment on whether this level of penetration is sufficient to comprise an effective public warning system. If it is not, what level of penetration should we seek and what is the best mechanism for reaching that goal?

Mass media effectively promulgates important messages. In case of an emergency, both television and radio stations have emergency response policies in place to communicate vital and valuable information to their viewers and listeners. With the heightened attention to security, in light of recent acts of terrorism, there is an increased need to spread urgent security information, warnings and alerts to as many people as possible as quickly as possible.

EAS in its current form is effective in reaching only a small percentage of the population affected by a state of emergency or natural disaster. This level of penetration is unacceptable

in light of current technological advances in the field of communication. The goal of the EAS should always be to reach 100% of the people during an emergency. Although this lofty goal may never be reached, it should nevertheless always be the mark of achievement sought for by the EAS. Therefore, the FCC, in conjunction with the Department of Homeland Security (DHS), NOAA, and all other departments of the Federal government assigned the responsibility of alerting the public to emergencies and threats to life and property should constantly be looking for new and innovative ways in which to rapidly and reliably reach the greatest number of people during any given emergency.

The responsibility for examining the multitude of new technologies and means of communication having the potential for enhancing and improving the EAS certainly represents a daunting challenge to the Commission. Choosing those technologies and means of communication for ultimate inclusion and the ways in which to successfully incorporate them presents an even greater challenge. However, in the end choices must be made, and we are confident that the Commission will act decisively and intelligently concerning these important matters of safety involving the citizens of this great country.

Global Marketing Solutions, Inc. has developed one such technically advanced system. This new patent pending technology has the potential for revolutionizing the way in which people receive critical information.

This technology provides for a satellite system to display and distribute live video and/or audio to both easily accessible and remote locations that can be instantly changed and/or interrupted to reflect the most current of events. The content displayed throughout a potential network of modular flat screens can be changed or modified according to the time of day, day of week, weather, location, or in conjunction with holidays, special occasions, natural disasters, and local, state, or Federal states of emergency. These screens can be located anywhere regardless of broadband availability and include a variety of locations such as airports, bus and rail stations, shopping malls, community centers, convention centers, theatres, hotels, and billboards in both metropolitan areas and rural communities. Screens may also be mobile, mounted to vehicles such as buses, cargo vans or semi-truck trailers. They can also be created in nearly any size to fit a multitude of applications from billboards to kiosks to shopping carts. A network can stretch from Portland, Maine through Fargo, North Dakota all the way to San Diego, California broadcasting without delay anything; from a live advertising message to the President's State of the Union address.

Due to the need for important government messages that can be changed or modified in real time, without delay, this new technology is gaining a tremendous amount of national attention in not only the advertising industry, but with local, state and Federal officials as well. In cases of national, regional or local crisis, such as a terrorist threat, severe weather emergency, earthquake or other natural disaster, when power may be lost and citizens are frightened and confused, this technology will enable government officials to communicate specific, localized warnings and information to a large percentage of the population residing in those areas affected by the emergency, providing vital information and comfort to those who need it. Many experts agree that this is the most viable solution to greatly enhancing the antiquated

EAS. Experts also agree that this system has the greatest potential of dramatically improving the EAS nationally at the lowest cost to taxpayers of any proposed changes made to date.

In a recent interview with Bill Hockett, of Critical Data, Inc., Mr. Hockett stated that “in a world where interconnectivity is becoming a vital part of our lives, this technology will revolutionize the way that national, state and local governments connect to every resident regardless of area of residence, income or any other physical or socio-economic barrier, for emergency notification. Therefore, due to the unprecedented heightened security in our nation and throughout the free world since 9-11 it is vital that this new technology be implemented nationwide as quickly as possible, as this system will, when in place, save potential countless lives should another attack occur.”

There is a real and critical need for a system, such as the one we are currently developing, for communicating vital information to a large percentage of the population that can be changed or modified in real time, which will operate even when power is lost. This system should be given the recommendation and full support of this Commission in addition to a recommendation for governmental assistance in completing and implementing the system, thereby becoming an integral part of the EAS.

2. **Sec. E 32.** Because EAS relies almost exclusively on delivery through analog radio and television broadcast stations and cable systems, is EAS, in the current communications universe, outdated? Instead, should there be a concerted government/industry effort to combine EAS with alternative public alert and warning systems (APAWS) to form a comprehensive national public warning system capable of reaching virtually everyone all the time? The possibilities are numerous and varied. Several companies offer landline-based interactive notification systems that would convey national, regional, and local emergency messages via the public switched telephone network to wireline telephone subscribers located in the specific geographic areas affected by emergencies. Other companies offer systems that use Internet and/or cellular capabilities, including the cell broadcast feature of digital cellular networks, to deliver alerts to mobile handsets of wireless subscribers or to televisions, cable boxes, clock radios, cars, computers, stand alone units or other devices after incorporating patented receiver devices. Some companies offer satellite based warning and messaging systems which use very small aperture terminal networking to provide direct satellite communications. There are also emergency message and warning systems offered on a subscription basis that use computerized calling systems, fax, email, and digital messaging to reach many different types of devices. Some of these systems are used currently by certain states, along with EAS as part of their public alert and warning system. How could a combined warning system that makes use of some or all of the features described here be implemented? Should the Commission require any APAWS to participate in the existing EAS and, if so, which ones and how should they participate? For example, should all APAWS be required to be compatible with the existing EAS protocol? In considering these issues, should our analysis distinguish between wireless systems used primarily for one-versus two-way communication, or point-to-point or multi-point versus broadcast?

Commenters should discuss any legal or practical barriers to its implementation and effectiveness, noting whether legislation would be required from Congress or by Executive Order.

As the Commission has noted, there are a vast array of different technologies and mediums available for examination for inclusion in an updated EAS. Unfortunately, the vast majority of viable mediums for alerting the public in the event of an emergency, such as cellular telephones and PC's, were developed without giving much consideration, if any at all, to the possibility of inclusion in the EAS. As a result, these technologies are not currently capable of easy integration into the EAS as it is currently structured. The fact that most are not compatible with each other raises hurdles that may be difficult to overcome. The associated costs for doing so may also result in moderate to high levels of resistance by these companies, particularly if any of the costs are to be carried by the companies themselves. In addition, the time frame for implementation of the various mediums and the technologies used to tie them together may require several years, if not more to complete, raising yet additional concerns. Certainly, all avenues for tying these conduits for reaching the public need to be sought and examined, and a plan for implementation and inclusion in the updated EAS for those deemed feasible put into place. In the meantime, avenues that can be quickly and easily deployed need to be at the forefront of all decisions concerning any proposed changes and/or modifications to the EAS.

Global Marketing Solutions, Inc. is in the various stages of prototype development of each of the multiple applications for the aforementioned technology. Should the Commission decide to investigate further the implementation of this system, which will utilize a multitude of applications on a national level, the FCC along with the DHS, NOAA and other government agencies responsible for alerting the public, would be afforded the rare opportunity of being intimately involved in the programming and implementation of this system from its inception. This system can be programmed to be ideally suited for transmission and coordination under the updated EAS. In addition, programming can also include the ability to be easily updated or modified in the future.

This proprietary system is intended for the broadcast of advertising. However, we have the ability to program a large segment of each screen to be dedicated solely to the use of local, state and Federal agencies for use in providing critical and useful information to the public 24 hours per day. In other words, a portion of the screen would be playing governmental alerts and messages all of the time, rather than on occasion, requiring the disruption of a live broadcast or recorded advertising running at the time.

We are proposing a cooperative partnership be formed between our company and those organizations responsible for the dissemination of vital alerts, warnings and messages to the public. This partnership would work closely together to complete the prototypes, formulate the best strategy and timelines for implementation, and the ultimate implementation of this critical system on a national level. Implementation may also necessitate the need for Congressional and/or Presidential involvement in overcoming certain foreseeable and unforeseen obstacles to its rapid deployment. We are looking for partial governmental funding

in order to rapidly deploy this system throughout the United States. However, once in operation, the cost for maintaining, updating and operating the displays would be borne solely by Global Marketing Solutions, Inc. In addition, there is the possibility of revenue being paid to the government under a profit sharing arrangement should certain conditions be met. Potential revenue transferred to the government under this arrangement would easily exceed \$1 billion annually.

IV. CONCLUSION

Our vision is a nationwide EAS where all government agencies have coordinated access to a comprehensive system for communicating with the public. A system dedicated solely to providing vital information to the public 24 hours per day. A system unaffected by power outages. A system secure from malicious interference and signal jamming. A system capable of reaching the maximum number of people at any given moment.

The technology we are developing has the ability to quickly and effectively reach a vast majority of the population at any given moment once it is fully operational. We do not consider this system, however, to be the “system of systems”. Rather we see it as a quantum leap forward in the evolution of the EAS; having the ability to greatly improve and enhance the current EAS. There are other technologies that should also be considered and ultimately included in the EAS for the 21st century.

The system we are proposing for inclusion in the EAS, to be designed, developed and implemented in close partnership with the United States government, does have the potential for saving countless lives and damage to property in event of a crisis by enabling government officials to instantly communicate warnings and vital information to a large segment of the population at any given moment. In addition, this system will assist with law enforcement efforts and provide general messages of local interest, such as traffic and weather reports, road conditions and closures, etc.

By conveying important government messages continuously, 24 hours per day, the public will become accustomed to viewing these screens whenever one is present. Over 98% of people questioned in a recent study responded that they would read the governmental messages on signs of this nature and that they would continue to read the messages as they traveled on foot and/or by automobile. Over 95% responded that they would also read alert information on every sign, regardless of the number encountered during their travel.

Clearly there is a real and immediate need for such a system. The American people deserve every effort on their behalf to provide the most effective EAS possible. We believe that the public interest requires no less.

Global Marketing Solutions, Inc. requests notification of and inclusion in all opportunities to present oral information and arguments before the Commission, whether to individual

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commissioners or to the Commission as a whole, concerning the review of the Emergency Alert System (EAS).

Thank you for your time and consideration in this important matter. I am confident that once the Commission has the opportunity to review the benefits of including the system under development by Global Marketing Solutions, Inc. in greater detail they will be as excited as we are about what this system will provide for the American people.

Our team of trained, caring and dedicated professionals look forward to taking the next step and working with the FCC, DHS, NOAA, members of law enforcement and all other interested governmental offices and agencies in bringing this project to fruition. We look forward to hearing from you soon. If you have any questions, comments or concerns, please don't hesitate to contact me, as I will be more than happy to respond. I can be reached at (208) 667-5633, or on my cell phone at (208) 704-0309. You can also E-Mail me at costerson@adelphia.net. Again, thank you.

Signed and submitted this 26th day of October, 2004.

Respectfully submitted,

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